FOIA Request

EPA-R6-2014-3115

Documents 1 of 1

MEMORANDUM

SUBJECT:	Transmittal Memo - Compliance Monitoring Report(s)	
FROM:	Samuel Tates, Chief Samuel Tates 3/5/2012 Surveillance Section (6EN-AS)	
TO:	Paulette Johnsey, Chief NPDES Compliance Monitoring Section (6EN-WC)	
	ompliance evaluation inspection was conducted on January ctor David Long at the following location:	31 – February 01,
Facility Name	Georgia Pacific LLC	
Address:	100 Mill Supply Road	RECEIVED
City:	Crossett, Arkansas 71635	MAK 1 8 2012
Permit No.:	AR0001210	Control of the second
Type Facility:	Federal () Municipal () Non-Municipal (X)	
Compliance m	onitoring reports attached: (Check appropriate box)	
	NPDES	
(X) Major () Minor () NOD	(X) CEI () PAI () PCI () CSI () DIA () IU () CSI-Toxics () BIO () Agricultura	1
Comments:		
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EPA NPDES Compliance Inspection Report								
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Inspection:Work Days. Facility Evaluation Rating. 88184	QA Aller -	Reser	ved					
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Section B: F			94 - W. III O Z - W. OZ - OZ					
Name and Location of Facility Inspected Georgia Pacific LLC	Entry Time/D	Date 1. 01/31/2012		Permit Effective D 09/30/2010	ate			
100 Mill Supply Road	Exit Time/Da			Permit Expiration	Date			
Crossett, AR	04:50 p.m	. 02/01/2012	-	10/31/2015				
Name(s) of On-Site Representatives	Title(s)			Phone Number				
James Cutbirth Rachel Johnson	Environmental At Environmental Ex			870-567-8144 870-567 - 8170				
Name, Address of Responsible Official	Title	Igilieei	!	070-307-0170				
James Cutbirth	Environmental At	ifairs Manager	r .					
Georgia-Pacific, LLC	Phone Number 870-567-8144	C	ontacted:	YES_X_NO	-			
P.O. Box 3333 Crossett, AR 71635	070-367-6144	0,	·					
	I Evaluated During Inspecti	on		·				
(S = Satisfactory, M = Margina	, U = Unsatisfactory, N =	Not Evaluated)	31 N		SACESTA CONTRACTOR			
S Permit S Flow Measurement	N Storm Wa	ter	N	CS0/SS0				
M Records/Reports M Self-Monitoring Progra	m S Sludge Ha	andling/Disposal	N	Pollution Preventio	in .			
M Facility Site Review S Compliance Schedules	N Pretreatm	ent	N	Multimedia -				
S Effluent/Receiving Waters U Eaboratory/ Section D: Summary of Findings/C		s & Maintenance	g and					
Section b. Summary of Findings/C	Oralinents (Attach addition	ial sheets if heces	sary)	٠				
EXECUTIVE SUMMARY: The inspection report and	ratings in Section	C (Areas Eval	uated [During Inspecti	ion)			
are those of the state inspector. Refer to the attack	ed state report for	a summary of	f the fir	ndings in the a	reas			
evaluated during the inspection.		0						
The Compliance Evaluation Inspection (CEI) was a	and united by the Ct.	ota of Arkonoc	na Dane	artmont of				
The Compliance Evaluation Inspection (CEI) was continuous Environmental Quality (ADEQ) Inspector John Lam	b. All areas marke	d in Section C	: were :	artifient of adequately	-			
evaluated by the inspector and met the needs of th	e National Poliutan	t Discharge E	liminat	ion System	• •			
(NPDES) Program.								
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Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telepho	IIIC		Date				
Maried Long	US EPA/6EN-AS/	(214) 665- 732	3	03/06/201	2			
Signature of Reviewer			260					
	Agency/Office	THE RESERVE AND ADDRESS OF THE PARTY OF THE	200 March 1980 March 1	Date				



A R K A N S A S Department of Environmental Quality

February 27, 2012

Mr. James W. Cutbirth, Environmental Affairs Manager Georgia Pacific, LLC Crossett Operations P.O. Box 3333 Crossett, AR 71635

RE: Compliance Inspection

AFIN: 02-00013, NPDES Permit No.: AR001210

Dear Mr. Cutbirth:

On January 31 and February 01, 2012, David Long, USEPA Region 6, Ronald Smith, ADEQ District 10 Water Inspector, and I performed a routine compliance inspection of the facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following:

- 1. The facility contract lab (Test America) is not specifying which method in Standard Method is being used for Nitrate-Nitrogen analysis. This is a violation of Part III.C.3 of the permit.
- 2. The bar screen area had excessive solids on both sides of the ground. This area needed better housekeeping. This is a violation of Part III.B.1.a of the permit.
- 3. The last wing levee in the Aeration Stabilization Basin (ASB) had excessive erosion it. This is a violation of Part III.B.1.a of the permit.

The above items require your immediate attention. Please submit a written response to these findings to Water Division Enforcement Branch. This response should be mailed to the address below, or e-mailed to Water-Enforcement-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentations (i.e. photos) is due by March 08, 2012.

Letter to James Cutbirth, G-P February 16, 2012, Page 2

It was also noted that the facility was not following the method as outlined in Standard Methods 2540 for TSS analysis. The facility was shaking and pouring the sample instead of using a stirrer and pipette according to the method. The facility stated that this is more representative way due to the nature of the effluent not being homogenous. The facility should contact Ms. Jane Hurley, ADEQ QA Officer, at 501-682-0938 for written approval for variance in the method.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 870-862-0680.

Sincerely,

John W. Lamb

District 8 Field Inspector

John W. Lung

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460									
NPDES Compliance Inspection Report									
	Section A: National Data System Coding								
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inc.	me and Location of Facility Inspect hude POTW name and NPDES perm			charging to POT	W, also	,	Entry Time/Date 09:45/01/31/2012		Permit Effective Date 30 September 2010
Cr	orgia Pacific LLC ossett Operations Mill Supply Road				-		Exit Time/Date 4:50/02/01/2012		Permit Expiration Date 31 October 2015
Cr	ossett, AR						. •	Ţ	
Jai	me(s) of On-Site Representative(s)/ nes Cutbirth/Environmental Affa chel Johnson, Environmental Eng	rs M	anager /870-567-814	mber(s) 14				Oth	er Facility Data
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	nes Cutbirth, Environmental Aff orgia-Pacific, LLC	airs N	4anager /870-567-81	144			Contacted		
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M	Records/Reports	M	Self-Monitoring F	rogram	S	Slu	lge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	S	Compliance Sche	dules	N	Pre	treatment	N	Multimedia
s	Effluent/Receiving Waters	U	Laboratory	·	N		rm Water		Other:
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	me(s) and Signature(s) of Inspector	(s)	- ·	Agency/Office/					Date
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FIN: 02-00013	Permit #: AR0001210

SECTION A: PERMIT VERIFICATION	
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DETAILS:	EIS LIM LIU LINA LINE
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	MY ON ONA ONE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	MY ON ONA ONE
4. ALL DISCHARGES ARE PERMITTED:	MY LIN LINA LINE
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SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	OS MM OU ONA ONE
DETAILS: see page 9	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	MY ON ONA ONE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	OS MM OU ONA ONE
a. DATES AND TIME(S) OF SAMPLING:	ØY □N □NA □NE
b. EXACT LOCATION(S) OF SAMPLING:	ØY □N □NA □NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	ØY □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	OY MN ONA ONE
e. RESULTS OF CALIBRATIONS:	Øy □n □na □ne
f. RESULTS OF ANALYSES:	Øy □n □na □ne
g. DATES AND TIMES OF ANALYSES:	Øy □n □na □ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	ØY □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	ØS OM OU ONA ONE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs □m □u □na □ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	ØY ON ONA ONE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S ☑M □U □NA □NE
DETAILS: see page 9	•
1. TREATMENT UNITS PROPERLY OPERATED:	Øs □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	OS ØM OU ONA ONE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs □m □u □na □ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	ØS □M □U □NA □NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	ØS □M □U □NA □NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	ØS □M □U □NA □NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	Øy □n □na □ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	ØY ON ONE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	ØY □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	□Y □N ☑NA □NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	□Y □N ☑NA □NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	DY DN ØNA DNE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□Y ØN □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	DY ON MA ONE
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AFIN: 02-00013

Permit #: AR0001210

SECTION D: SAMPLING	AND COMPANY OF THE PARTY OF THE
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS □M □U □NA □NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	MY ON ONA ONE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy □n □na □ne
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	ØY □N □NA □NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	MY ON ONA ONE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	MY ON ONA ONE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	MY ON ONA ONE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	⊠Y □N □NA □NE
b. PROPER PRESERVATION TECHNIQUES USED:	MY ON ONA ONE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	MY ON ONA ONE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	MY ON ONA ONE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: Parshall flume	MY ON ONA ONE
2: FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	MY ON ONA ONE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	MY ON ONA ONE
4. CALIBRATION FREQUENCY ADEQUATE:	MY ON ONA ONE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	MY ON ONA ONE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	MY ON ONA ONE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	MY DN DNA DNE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	MY DN DNA DNE
9. HEAD MEASURED AT PROPER LOCATION:	MY DN DNA DNE
SECTION F: LABORATORY	
The state of the s	OS OM ØU ONA ONE
DETAILS: see page 9	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	□Y ØN □NA □NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	DY ØN DNA DNE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	ØY □N □NA □NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	DY ØN ONA ONE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	ØY ON ONA ONE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	MY ON ONA ONE
7. COMMERCIAL LABORATORY USED:	MY ON ONA ONE
a. LAB NAME: Test America/Environ/Environ/Analytical Perspectives	
b. LAB ADDRESS: Mobile Al/Brentwood Tn/Wilmington NC,	***************************************
c. PARAMETERS PERFORMED: chlorinated phenols, AOX, metals, nutrients, chloroform & pesticides, /Bio monitoring/Dioxin	
BIOMONITORING PROCEDURES ADEQUATE:	Øy □n □na □ne
a. PROPER ORGANISMS USED:	MY ON ONA ONE
b. PROPER DILUTION SERIES FOLLOWED:	MY ON ONA ONE
c. PROPER TEST METHODS AND DURATION:	MY ON ONA ONE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	MY ON ONA ONE
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	11. IN	ISPECTIC	AND CONDUCTED AS	REQUIRED:					Œ1Y	LN LIN	A LINE

		FLOW CALCULATION	SHEET
	· :		
Date: 31	Jan 2012 T	ime: 11:28	
Head in Inc	hes: 18.0 "	Feet: 1.5'	
Type & Size	e of Primary Flow N	Measurement Device: 8	3 foot parshall flume
Name & Mo	odel of Secondary	Flow Measurement Dev	vice: Milltronics OCM III
Date of last	Calibration of Sec	condary Flow Device: 12	2/22/2011
Recorded F	low at Date & Time	e Listed Above: 38.2	5 mgd (Facility Flow Meter)
	Flow at Date & Tin	ne Listed Above. 39.0 SCO Open Channel Flow Measu	
	Recorded Value	- Calculated Value	
% Error =		lated Value	X 100
% Error =	38.25	- 39.68 39.68	X 100
% Error =	3.6	%	
Comments:	Less than 10 %	error is acceptable.	

DMR Calculation Check

Reporting Period:

From 2011

Year

Dec Month

01 Day To 2011

Year

Dec Month

31 Day

Parameter Checked:

BOD

Loading

Mass

Mo. Avg. - lbs/day

Concentration

Monthly

Mo. Avg. - mg/l

Daily Max. - mg/l

Reported Value:

7,982

24.1

30.5

Calculated Value:

7,982

24.1

30.5

Permit Value:

24,155.4

64.4

123.8

If calculated value does not equal reported value, explain:

equal

NPDES Compliance Inspection Report Further Explanation

<u>Section B</u>: The facility has a BMP plan as required by the permit (Part II, item 9,). This plan was being implemented at the time of the inspection.

The facility has started implantation of a Mercury Pollutant Minimization Plan as required by the permit (Part II, 20 of the permit). The plan was started on September 01, 2011 and revised on November 08, 2011.

<u>Section B, item 9: & Section F, item 1:</u> The facility's contract lab (Test America) did not specify the method number from Standard Methods it was using for Nitrate-Nitrogen analysis. The lab simply stated it was from Standard Methods.

<u>Section C, Item 2</u>: The last wing levee in the Aeration Stabilization Basin (ASB) had excessive erosion on it. See photos 1 and 2.

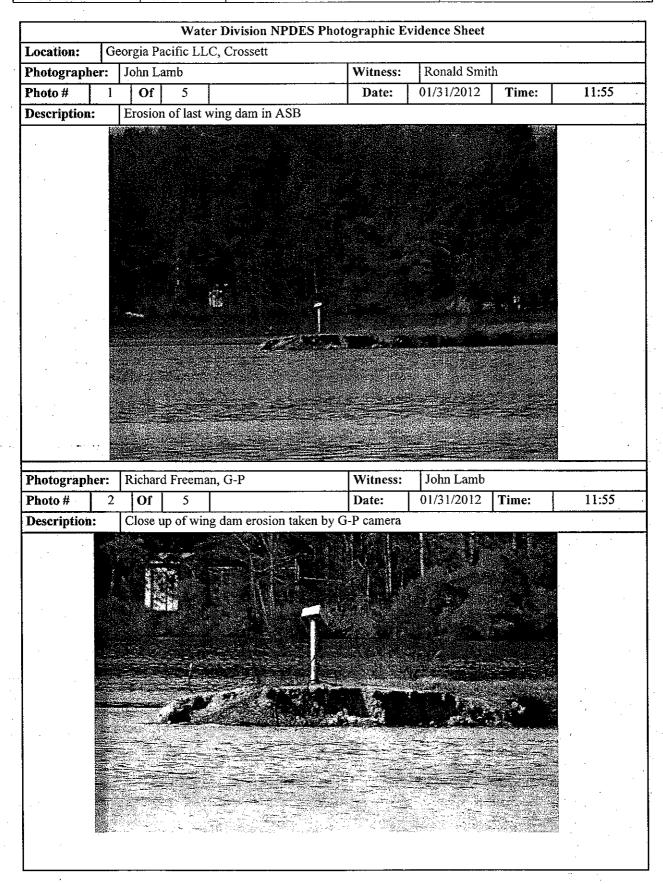
The bar screen had excessive solids on the ground on both sides which needed to be cleaned up. See photos 3-5.

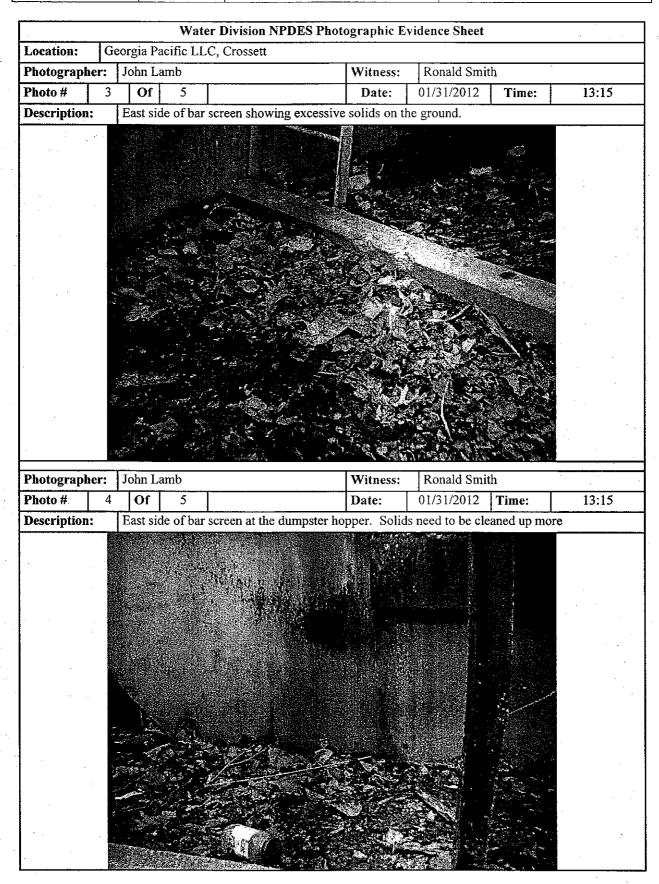
Section F, items 1 and 2: The facility was not following the method as outlined in Standard Methods 2540 for TSS analysis. They were shaking and pouring the sample instead of using a stirrer and pipette according to the method. The facility fills that this is more representative way due to the nature of the effluent not being homogenous. The facility should contact Ms. Jane Hurley, ADEQ QA Officer, for written approval for variance in the method.

<u>Section F, item 4</u>: The facility's laboratory S.O.P.s needed to be updated to showing exact procedures used, approval date and person approving the S.O.P's to reflect what is going on in the lab. For example, the lab procedures had the approval signature of a person that no longer worked at the facility. The facility should consider contacting Ms. Jane Hurley at ADEQ to help establish better OA/QC procedures for the lab.

Section G: SMS 002 was not viewed or inspected due to being flooded by the Ouachita River at the time of the inspection. The river level was over 62 feet at Felsenthal Lock and Dam and as defined in the permit, Mossy Lake is considered flooded at a river stage of 62 feet or above and for two weeks following the river level falling below 62 feet.

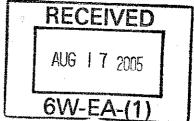
<u>Section J</u>: A more in depth explanation of the facility's SWPPP, controls and etc. can be found in the inspection report for ARR00A776 conducted same date for the facility.





Water Division NPDES Photographic Evidence Sheet										
Location:				C, Crossett						
Photographer		John L	amb			Witness:	Ronald Smi	th		
Photo #	5	Of	5			Date:	01/31/2012	Time:	13	:15
Description:		West s	ide of bar	screen, solids	s on the gro	und		-		
	200		1 100		. Light with the	entile general secondary of	A37533 FS	Control of the contro		
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	(多)在 (1) (1)	AG								
Photographer	. 1			24-9-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	en destruction (* * d	Witness:				
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Description:	•		<u> </u>			<u> </u>			1	
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		•								

Form Approved **⊕EPA** MB No. 2040-0003 RECEW Eval Expires 7-31-85 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 9 2005 Washington, D.C. 20460 JUN AM/Toxics & Inspection JUN 15200 TPDES Compliance Inspection Report cordination Branch 6EN-A Section A: National Data System Coding Inspec. Type Transaction Code yr/mo/day Fac Type T Remarks Inspection Work Days 72 N 70 3 N Section B: Facility Data Entry Time /Date Permit Effective Date Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) 09:15/ 05/05/25 01 September 2004 Georgia Pacific Corporation d/b/a Georgia Pacific Crossett Paper Operation, Exit Time/Date Permit Expiration Date 100 Papermill Road 18:05/05/05/25 31 August 2009 Crossett, AR Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Other Facility Data Alan Thomas/Environmental Engineer-870-567-8670, James Turberville, Environmental Specialist/870-567-8670 James Cutbirth, Technical Service Manager/870567-8144 Fax 870-364-9076 Name, Address of Responsible Official/Title/Phone and Fax Number Charles E. Hodges, Senior Vice President 870-567-5049 Contacted Georgia Pacific Corporation P.O. Box 3333 No Crossett, AR 71635 Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated) S Operations & Maintenance \mathbf{U} Sampling S Permit Flow Measurement U Records/Reports U Self-Monitoring Program S Sludge Handling/Disposal \mathbf{S} **Pollution Prevention** S **Facility Site Review** Ν Compliance Schedules Pretreatment N Multimedia Effluent/Receiving Waters Laboratory Storm Water Other: Section D: Summary of Findings/Comments (Attach additional sheets if necessary) See Attachment 3 for comments RECEIVED



Name(s) and Signature(s) of Inspector(s) John Wesley Lamb Uple And	Agency/Office/Telephone/Fax ADEQ/El Doraod/870-862-5941/870-862-3509	Date 0754We 2005
Patricia Willis Patricia Willis	EPA Region 6/Dallas/214-665-8356/214-665-7446	10-10-05
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date
	RE(France / France

	PERMIT NO. AR0001210
SECTION A - PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:	(FURTHER EXPLANATION ATTACHED <u>NO</u>)
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	■Y □N □NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	OY ON ■NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	₩Y□N □NA
4. ALL DISCHARGES ARE PERMITTED	EY ON ONA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.	FURTHER EXPLANATION ATTACHED <u>Ves</u>)
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	■Y.□N □NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	□S □M ■U □NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	□ Y ■ N □ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	□Y∎N□N
c) ANALYTICAL METHODS AND TECHNIQUES.	■Y□N □NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	■Y □N □NA
e) DATES AND TIMES OF ANALYSES.	MY DN DNA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	■Y□N □NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	■S DM DU DNA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	■ S O M O U O NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	MY ON ONA
SECTION C - OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.	URTHER EXPLANATION ATTACHED <u>NO</u>)
1. TREATMENT UNITS PROPERLY OPERATED.	■S DM DU DNA
2. TREATMENT UNITS PROPERLY MAINTAINED	■S □ M □ U □ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	■S□M□U ⊕NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	MIS OM OU ONA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	■S □ M □ U □ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	ES DM DU DNA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	M S O M O U O NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	■Y □N □NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	■Y □N □NE

	PERMIT NO. AR0001210
SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	□Y □N ■NA □Y □N ■NA □Y □N ■NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	□Y□N ■NA □Y□N ■NA
SECTION D - SELF-MONITORING	
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. S S M U S NA (FURTHER EXPLANATION DETAILS: see Attachment 3	NATTACHED VES).
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	■Y □N □NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	■Y □N □NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	■Y □N □NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	■Y □N □NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	■Y □N □NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	□Y ■N □NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	MY ON ONA
b) PROPER PRESERVATION TECHNIQUES USED.	MY ON ONA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136	EY DN DNA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	■Y □N □NA
SECTION E - FLOW MEASUREMENT	•
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ■ S □ M □ U □ NA (FURTHI DETAILS:	ER EXPLANATION ATTACHED <u>NO</u>)
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICEparshall flume at Outfall 001, weir at SMS 002	TY DN DNA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	MY DN DNA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	BY ON ONA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION <u>April 2005</u>) RECORDS MAINTAINED OF CALIBRATION PROCEDURES. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	MY ON ONA MY ON ONE MY ON ONA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	■Y □N □NA
6. HEAD MEASURED AT PROPER LOCATION.	■Y □N □NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	■Y □N □NA
SECTION F - LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.	HER EXPLANATION ATTACHED <u>NO</u>
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)	■Y □N □NA

						PERMIT	NO. AR0001210
SECTION F - LABORA	ATORY (CONT'D)				•		
2. IF ALTERNATIVE A	NALYTICAL PROCED	OURES ARE USED, PR	OPER APPROVAL HA	S BEEN OBTAINED		■ Y□	N 🗆 NA
3. SATISFACTORY CA	ALIBRATION AND MA	INTENANCE OF INSTE	RUMENTS AND EQUIP	MENT.	·	■S □M□	J 🗆 NA
4. QUALITY CONTRO	L PROCEDURES ADE	EQUATE.				■S □ M □	U 🗆 NA
5. DUPLICATE SAMPI	LES ARE ANALYZED.	.10_ % OF THE TIME.			·	■Y□	N 🗆 NA
6. SPIKED SAMPLES	ARE ANALYZED. <u>10</u> °	% OF THE TIME.				■Y□	N 🗆 NA
7. COMMERCIAL LAB	ORATORY USED.					• ■Y □	N D NA
LAB NAME <u>STL Mob</u> LAB ADDRESS <u>Mobi</u> PARAMETERS PERF	le, AL,		ta Analytical Perspe Vilmington, NC, Dioxin and Furans	Doylir	nalytical Inc ne, LA montoring		
SECTION G - EFFLUE	ENT/RECEIVING WAT	ERS OBSERVATIONS	•	_S □M ■U □	NA (FURTHER EXPLA	NATION ATTACHED	yes_).
Based on visual	observations or	niv.					
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER .
001	none	None	Moderate	Yes, but not persistent	None	Dark brown	
SMS 002	None	None	Moderate	Yes, but not persistent	Yes	Dark Brown	
Comments: See	Attachment 3						
SECTION H - SLUDG	SE DISPOSAL						
SLUDGE DISPOSAL DETAILS: See Attac	MEETS PERMIT REC	QUIREMENTS.		■S □ M □	U INA (FURTHER	EXPLANATION ATT	ACHED_yes_).
1. SLUDGE MANAGE	EMENT ADEQUATE T	O MAINTAIN EFFLUEN	IT QUALITY.			■S□M□	U 🗆 NA
		REQUIRED BY 40 CFR			·	OS DM OL	J e na
				RICULTURAL, PUBLIC C	CONTACT SITE)		
SECTION I - SAMPL	ING INSPECTION PR	OCEDURES		(FURTHER EXP	LANATION ATTACHED_	<u>no</u>).	
1. SAMPLES OBTAIN	NED THIS INSPECTIO	DN.				YI	N I NA
2. TYPE OF SAMPLE					•		
GRAB	COMPOSITE SAMP	PLE MET	HODf	REQUENCY			
3. SAMPLES PRESE	RVED.					O Y O	N ■ NA
4. FLOW PROPORT	IONED SAMPLES OB	TAINED.		· · · · · · · · · · · · · · · · · · ·		ΠYD	N ■ NA
5. SAMPLE OBTAIN	ED FROM FACILITY'S	SAMPLING DEVICE.				DY D	N II NA
6. SAMPLE REPRES	SENTATIVE OF VOLU	ME AND NATURE OF	DISCHARGE.			OY O	N ■ NA
7. SAMPLE SPLIT W	/ITH PERMITTEE.					OYD	N M NA
8. CHAIN-OF-CUSTO	ODY PROCEDURES (EMPLOYED.			-	_ Y <u></u>	N = NA
	CTED IN ACCORDAN					_ Y _	N ■ NA

DMR Calculation Check

Reporting Period:	From	2005	<u>April</u>	<u>01</u>	To	2005	<u>April</u>	30
		Year	Month	Day		Year	Month	Day

Parameter Checked: BOD 001

·	Loa	ading	Con	centration
		Iass	Monthly	7-Day Avg. or
	Monthly Avg. lbs/ day	Daily Max. lbs/day	Avgmg/L	Daily Max- mg/L
Reported Value:	13,690	16,378	35.9	42.1
Calculated Value:	13,690	16,378	35.9	42.1
Permit Value:	26,310	50,617	70	135

FLOW CALCULATION SHEET

Field Data: Date 05/25/05 Time 15:100			
Head in Inches = <u>1.74</u> ft.	* · · · · · · · · · · · · · · · · · · ·		
Type & Size of Primary Flow Measurement Device	ce 8 foot Parshall flume		
Name & Model of Secondary Flow Measurement	Device Milltronics		
Recorded Flow at date & time listed above 49.49) MGD		
Flows are calculated from flow charts taken from	n the <u>ISCO Open Channe</u>	l Flow Measurer	<u>nent Handbook</u>
1.74 ft. = 50.36 M.G.D./g.	.p.m.		
% error = $\frac{recorded\ value\ -\ calculated\ value\ }{calculated\ value} \times 100$			
			•

1.72 less than 10% is ok

% error =_

Further Details

Section B: The name and the address of the contract lab did not appear on the facility's copies of the DMRs as required by Part II, Section C, Item 5 of the Permit.

Section B, item 2a: The facility was not documenting Chloroform samples dates and times for the 24 hour composites done weekly at Internal Outfalls 101, 102, 103.

Section B, item 2b: The facility was not documenting the individual performing Chloroform samples for the 24 hour composites done weekly at Internal Outfalls 101, 102, 103.

Section D, item 6: The sample tube at Outfall 001 was in need of replacement.

Section D, item 6: The facility has not been collecting the required minimum 12 effluent portions for a 24 hour composite at Internal Outfalls 101, 102, 103. See Attachment 6 for a copy of the facility's sample log for Internal Outfall 101.

Section G, Outfall 001: The facility had foam present below Outfall 001, but this foam was not in a persistent nature and dissipated below the Outfall.

Section G, SMS 002: The facility had foam present below SMS 002, but this foam was not in a persistent nature and dissipated below the SMS.

The facility was allowing distinct visible floating solids to be discharged from the SMS. The floating solids were in the form of duck weed and filamentous algae. See Attachments 4 and 5 for photos of the floating solids.

Section H: The facility removes sludge from the treatment plant via a clarifier for the pulp sewer and by the use of ash settling basins for the acid sewer. Both the sludge from the clarifier and ash basins are being used as fill material for closure of the old sludge pond. Also, ash from the settling basins is used for cover on the landfill (permitted by the ADEQ Solid Waste Division, Permit 292-S3N). As the solids are removed from the clarifier, they are dewatered by screw presses, then, the dewatered solids are trucked to the old sludge pond. As the solids are removed from the ash basins, they are dewatered by stock piling the solids beside the basins and allowed to dry. Then after a very large quantity of ash has accumulated, the facility transports the ash to the old sludge pond. (For more information, see the Permit fact sheet page 3, item 9.)

Other Conditions: Part III, item 9 of the Permit requires that Georgia Pacific (G-P) and the City of Crossett enter into and maintain an agreement for the discharge of the City's treated effluent into G-P's wastewater treatment system. G-P receives on average 1 MGD from the City' two oxidation lagoons prior to facility's Aerated Stabilization Basin (ASB). This agreement is in the final draft but has yet to be signed by the facility and the City. It is anticipated that the agreement be signed within a few weeks.

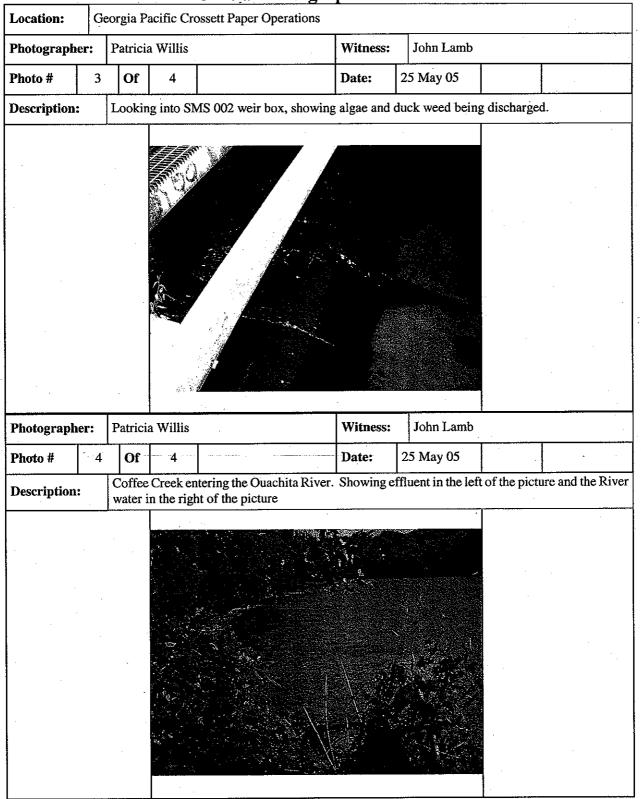
Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

AR0001210 Attachment 4

Location:	Ge	orgia P	acific Cre	ossett Paper Operations						
Photographer	:	Patrici	a Willis		Witness:	Jo	hn Lamb			
Photo #	1	Of	4		Date:	25 I	/Iay 05			
Description:		Standii box	ng beside	SMS 002, showing duck	weed, and of	ther	floating so	lids floating	g in to SMS	weir
Photographer	:	Patricia	a Willis		Witness:	Jo	hn Lamb			
Photo #	2	Of	4		Date:	25 N	May 05			
Description:		Standin	ng on SM	S weir box. Showing ducl	k weed and o	ther	solids floa	ting into th	e weir box	
				in the second se						

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

AR0001210 Attachment 5



луіа-Расінс
ssell Paper Operations
sell Arkansas 71635

DATE:5/1/05

START TIME: 0400

STOP TIME:_

Attachment 6
Outfall10/ by Lumb

IPLE LOCATION: AROSO

1ETER CALIBRATED: OK

SAMPLE CODE AROSO-B-055-1AEOP

ab Number	Date/Time	рН	Temperature	CI/CIO2 Residual	mL of 1N Thios.	Sample Iced	Sample collected by
1	5/1/05/0400	9.34	402	YesNo		Yes No	X
2	5/1/05/08/00	9.24	56.4	Yes No		Yes V No	RR
3	5/1/05 1/200	9,17	53.6	Yes		Yes_VNo	RR
4	5/1/05 1/600	9.26	57.0	YesNo	/ .	Yes_V_No	RR
5	5/1/05 12000	9,32	51,9	YesNo	/ \	Yes_VNo	RR
6	5/5/05 10000	910	57.6	YesNo		Yes_VNo	RR
omposite						YesNo	

ments/Deviations from sampling plan:		•	
			
	<u> </u>		· · · · · · · · · · · · · · · · · · ·

NAME OF TAKES OF TAKE

June 10, 2005

DATE:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
SURVEILLANCE SECTION
1445 Ross Ave.
Dallas, TEXAS 75202

FROM: Mike Michaud, Chief Surveillance Section (6EN-AS) TO: Estella Sugawara-Adams, Chief NPDES Compliance Monitoring Section (6EN-NPDES COMPLIANCE MONITORING	NC) spection was conducted on
NPDES Compliance Monitoring Section (6EN-\	
	spection was conducted on
un aversiant at a State land compliance maniforing in	spection was conducted on
5-25-05 at the following location:	
Facility Name: Georgia Pacific Corporation Crossett Pa	per Operation
Address: 100 Papermill Road	
City: Crossett, AR 71635	
Permit No.: AR00001210 (()	RECEIVED
Inspector: Patricia Willis	JUL 1 6 2005
Type Facility: Federal () Municipal () Non-Municipal	
Compliance monitoring reports attached: (Check appropriate	box) BEN-W
NPDES	
(X) Major (X) CEI - 05 () PAI () Minor () CSI () DIA () NOD () CSI-Toxics () BIO	() PCI () IU () STORMWATER
Comments:	

LINSAT

m D A	· · · · · · · · · · · · · · · · · · ·		shington, D.C. 20460		\$ 7		
EPA	NF⊅⊂S	•	nce Inspectio	•			<u></u>
Transaction Code	NPDES	yr/mo/day	National Data System Co	Inspection	п Туре	Inspector	Fac Type
1 N 2 5 3AR 0 0	0 0 1 2 1 0 11 12	0 5 0 5 2	5 13	18	-	1 4T	20 2
21 O V E R S I G H T	o f S t a t	e CEI		<u> </u>			66
							
Inspection Work Days Facility Evaluat 67 1 1 69 70 70	dion Rating 81	QA 72 <mark>N</mark>	7.	374	Reserved 75	80	
ame and Location of Facility Inspected		Sei	tion B: Facility Data			1 5 2 5 6	
orgia Pacific Corporation	•	•		Entry Time/Date 9:15am/5-		Permit Effe 9-1-04	
b/a Georgia Pacific Crossett Pap 0 Papermill Road, Crossett, AR,				Exit Time/Date 6:05pm/5	25-05	Permit Exp 8-31-4	iration Date
ame(s) of On-Site Representative(s)	71000	Title(s)	·	0.00pinio	20-00	Phone No	s)
an Tnomas mes Turberville			ntal Engineer ntal Specialist	•		870-567- 870-567-	
mes Cutbirth ame, Address of Responsible Official		Technical S	ervice Manager			870-567-	8144
naries E. Hodges	•	Senior Vice	President				
eorgia Pacific Corporation O. Box 3333, Crossett, AR 7163	, c .	Phone No. 870-567-504	10				Contacted Y No.
o. Doz 0000, Grosett, Art / 103		Section C: Are	as Evaluated During Inspe	ction			Yes X No
Permit	(S = Sa	atisfactory, M = Margi	nal, U = Unsatisfactory, N =	Not Evaluated)	N C	201000 10	- Oundows
Records/Reports	U Self-Monitoring F		S Stormwater S Sludge Hand	ing/Disnasal	- H	SO/SSO (Sewe Illution Preventi	•
Facility Site Review	N Compliance Scho	-	N Pretreatment		\vdash	ultimedia	
Effluent/Receiving Waters	S Laboratory		<u> </u>	Maintenance	├ ──┤	her:	
	Section D:	Summary of Findin	gs/Comments (Attach add	Itional chapte if nacar	tond		
John Wesley Lamb	870-862-5941		•			•	
							•
			- ** *				
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ame(s) and Signature(s) of Inspector(s)		Agency/Office/T	elephone	K		Date	
ame(s) and Signature(s) of Inspector(s)	> 10 ·		elephone -AS/(214)665-8356	R-		Date 6-10-05	
	\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		-	R-		}	
	Nillo		-	K		}	
	Nillo		-	K -		}	
	Nillo		-	P-		}	

⊕ÈPA

Form Approved OMB No. 2040-0003

UNITED STATES ENVIRONM	XECEIVE								
Washington	JUN 9 2005								
NPDES Compliand	Toxics & Inspection	3							
	ooldingtion Branch	-							
Transaction Code	nspec. Type Inspector 8 C 19 T 20	Fac Type							
0 2 - 0 0 0 1 3 As	h l e	у							
Inspection Work Days Facility Evaluation R	tating I	BI (QA		Reserved				
67 69 70 3	71	N 72	N 73	74 75		80			
	Section F	3: Facility	Data						
Name and Location of Facility Inspected (For industrial users disc include POTW name and NPDES permit number) Georgia Pacific Corporation			Entry Time /Date 09:15/ 05/05/25	: .	Permit Effective Date 01 September 2004				
d/b/a Georgia Pacific Crossett Paper Operation, 100 Papermill Road Crossett, AR			Exit Time/Date 18:05/ 05/05/25	:	Permit Expiration Date 31 August 2009	• .			
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Num Alan Thomas/Environmental Engineer-870-567-8670, James Turbe James Cutbirth, Technical Service Manager/870567-8144 Fax 870	erville, Environmer	ntal Specia	ist/870-567-8670	(Other Facility Data				
Name, Address of Responsible Official/Title/Phone and Fax Numb Charles E. Hodges, Senior Vice President 870-567-5049 Georgia Pacific Corporation P.O. Box 3333 Crossett, AR 71635	er		Contacted Yes No	x		•			
	ction C: Areas Every, M = Marginal,		ring Inspection sfactory, N = Not Evalua	ted)					
S Permit S Flow Measureme	ent	S Op	erations & Maintenance	U	Sampling				
U Records/Reports U Self-Monitoring	Program	S Sh	dge Handling/Disposal	s	Pollution Prevention				
S Facility Site Review N Compliance Scho	edules	N Pı	etreatment	N	Multimedia				
U Effluent/Receiving Waters S Laboratory		S Ste	orm Water	<u> </u>	Other:				
Section D: Summary	of Findings/Com	ments (At	ach additional sheets if	necessary)		*			
See Attachment 3 for comments									
				•					
Name(s) and Signature(s) of Inspector(s) John Westey Lamb	Agency/Office/ ADEQ/EI Dora		/Fax 2-5941/870-862-3509		Date 07June 2	2005			
Patricia Willis Arucia Villa	EPA Region 6/	Dallas/214	-665-8356/214-665-7446		6-10-05	1			
Signature of Reviewer		Date							

		PERMIT NO. AR0001210
SECTION A - PERMIT VERIFICATION		
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:	■S□M□U □NA (FU	ORTHER EXPLANATION ATTACHED <u>NO</u>
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE		■Y□N □NA
2. NOTIFICATION GIVEN TO EPAYSTATE OF NEW DIFFERENT OR INCREASED DISCH	ARGES	DYDN ENA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT		MY DN DNA
4. ALL DISCHARGES ARE PERMITTED		MY IN INA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS: see Attachment 3	□S□M■U □NA (FUF	RTHER EXPLANATION ATTACHED <u>V</u> ES)
1, ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.		■Y□N □NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	, <u>, , , , , , , , , , , , , , , , , , </u>	OS OM MU ONA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING		□ Y■N □NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING		□Y■N□N
c) ANALYTICAL METHODS AND TECHNIQUES.		■Y□N □NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.		■Y□N □NA
e) DATES AND TIMES OF ANALYSES.		MY ON ONA
f) NAME OF PERSON(S) PERFORMING ANALYSES.		MY DN DNA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUA	TE.	■S □M □U □NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE A	AND REPAIR.	■ S □ M □ U □ NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY AN	IALYTICAL DATA.	EY ON ONA
SECTION C - OPERATIONS AND MAINTENANCE		
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS:		HER EXPLANATION ATTACHED 170)
1. TREATMENT UNITS PROPERLY OPERATED.		■S□M□U □NA
2. TREATMENT UNITS PROPERLY MAINTAINED		■S□M□U □NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.		■S□M □U □NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.		■S□M □U □NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.		■S□M □U □NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.		■S D M D U D NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.		■S DM DU DNE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.		MY DN DNA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	-	MY ON ONE

	PERMIT NO. AR0001210
SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	OYON ■NA OYON ■NA OYON ■NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	□Y□N ■NA □Y□N ■NA
SECTION D - SELF-MONITORING	
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☐ S☐ M ■ U☐ NA (FURTHER EXPLANATION DETAILS: see Attachment 3	N ATTACHED_ VES _).
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	■Y □N □NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	■Y □N □NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	■Y □N □NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	MY DN DNA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	■Y □N □NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	□Y ■N □NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	MY ON ONA
b) PROPER PRESERVATION TECHNIQUES USED.	■Y □N □NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136	■Y □N □NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	■Y DN DNA
SECTION E - FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.	R EXPLANATION ATTACHED NO)
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICEparshall flume at Outfall 001, weir at SMS 002	■Y □N □NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	MY ON ONA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	MY ON ONA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION <u>April 2005</u>) RECORDS MAINTAINED OF CALIBRATION PROCEDURES. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	■Y □N □NA ■Y □N □NE ■Y □N □NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	MY ON ONA
6. HEAD MEASURED AT PROPER LOCATION.	MY ON ONA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	■Y □N □NA
SECTION F - LABORATORY	100
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.	R EXPLANATION ATTACHED_ NO _}
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CER 136.3 FOR HOURS 503.8/b) FOR SURDEES)	

						PERMIT	NO. AR0001210
SECTION F - LABOR	ATORY (CONTD)						
2. IF ALTERNATIVE A	ANALYTICAL PROCEI	DURES ARE USED, PR	ROPER APPROVAL HA	AS BEEN OBTAINED		■Y □	N 🗆 NA
3, SATISFACTORY C	ALIBRATION AND MA	AINTENANCE OF INSTI	RUMENTS AND EQUI	PMENT.		■S □M□	U 🗆 NA
4. QUALITY CONTRO)L PROCEDURES AD	EQUATE.		<u> </u>		■S □ M □	U 🗆 NA
5. DUPLICATE SAMP	LES ARE ANALYZED	0.10_ % OF THE TIME.	·	~ ~		■Y □ !	N 🗆 NA
6. SPIKED SAMPLES	ARE ANALYZED. <u>10</u>	% OF THE TIME.	.,	·		■Y □	N 🗆 NA
7. COMMERCIAL LAB	ORATORY USED.					■Y □!	N 🗆 NA
LAB NAME <u>STL Mob</u> LAB ADDRESS <u>Mobi</u> PARAMETERS PERF		V	Ita Analytical Perspe Wilmington, NC. Dioxin and Furans	Doyli	nalytical Inc ne, LA omontoring		
SECTION G - EFFLUE	ENT/RECEIVING WAT	TERS OBSERVATIONS	3.	os om ∎u o	NA (FURTHER EXPLAI	NATION ATTACHED	ves_).
Based on visual	observations or	nly.					
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	none	None	Moderate	Yes, but not persistent	None	Dark brown	
SMS 002	None	None	Moderate	Yes, but not persistent	Yes	Dark Brown	
		——————————————————————————————————————					
Comments: See	Attachment 3						
SECTION H - SLUDG	E DISPOSAL						
SLUDGE DISPOSAL DETAILS:	MEETS PERMIT REQ	UIREMENTS.		■S □ M □	U 🗆 NA (FURTHER E	EXPLANATION ATTA	CHED <u>no</u>).
1. SLUDGE MANAGE	MENT ADEQUATE TO	O MAINTAIN EFFLUEN	IT QUALITY.			■S □ M □ U	I □ NA
2. SLUDGE RECORD	OS MAINTAINED AS R	REQUIRED BY 40 CFR 5	503.			_S □M □U	■NA
3. FOR LAND APPLIE	ED SLUDGE, TYPE OF	F LAND APPLIED TO:_	_(e.g., FOREST, AGRI	CULTURAL, PUBLIC C	ONTACT SITE)		
SECTION I - SAMPLI	ING INSPECTION PRO	OCEDURES		(FURTHER EXPL	ANATION ATTACHED no	<u>o_</u>).	
1. SAMPLES OBTAIN	NED THIS INSPECTION	N.				□ Y □ N	■ NA
2. TYPE OF SAMPLE	OBTAINED						
GRAB	COMPOSITE SAMPL	LE METH	HODFF	REQUENCY			
3. SAMPLES PRESER	RVED.	· .				□Y □N	Ma NA
4. FLOW PROPORTIO	ONED SAMPLES OBT	AINED.				YN	■ NA
5. SAMPLE OBTAINE	ED FROM FACILITY'S	SAMPLING DEVICE.				OY DN	■ NA
6. SAMPLE REPRESI	ENTATIVE OF VOLUM	ME AND NATURE OF D	ISCHARGE.			□Y □ N	NA NA
7. SAMPLE SPLIT WI	ITH PERMITTEE.		·			□Y□N	ENA
8. CHAIN-OF-CUSTO	DDY PROCEDURES EN	MPLOYED.				□Y □N	NA NA
O SAMPLES COLLECTED IN ACCORDANCE WITH DEDMIT							

AR0001210

Attachment # 1

DMR Calculation Check

Reporting Period:	From <u>2</u>	2005	<u>April</u>	01	To	2005	April	30	
	Y	ear	Month	Day		Year		Month	Day
								:	
						-	,		
Parameter Checked:	BOD 001	÷							

	•	Loading Mass					
Avg. or	Monthly Avg. lbs/ day	Daily Max. lbs/day	Monthly Avgmg/L	7-Day			
Daily Max- mg/L	Withting Avg. ibs/ day	Daily Max. 1057 day	м, шул				
Reported Value:	13,690	16,378	35.9	42.1			
Calculated Value:	13,690	16,378	35.9	42.1			
Permit Value:	26,310	50,617	70	135			

If calculated value does not equal reported value, explain: equal

FLOW CALCULATION SHEET

Field Data: Date 05/25/05 Time	15:100			
Head in Inches = 1.74	ft.			
Type & Size of Primary Flow Measu	rement Device 8 foot	Parshall flume		
Name & Model of Secondary Flow M	Measurement Device N	<u>//illtronics</u>		
Recorded Flow at date & time listed	above 49.49 MGD			
Flows are calculated from flow chair	rts taken from the <u>ISC</u>	CO Open Channel	Flow Measur	ement Handbook
ft. =50.36	M.G.D./g.p.m.	ere		
% error = <u>recorded</u> value - calculated	<u>d value</u> x 100			
calculated value	_			

1.72 less than 10% is ok

Further Details

Section B: The name and the address of the contract lab did not appear on the facility's copies of the DMRs as required by Part II, Section C, Item 5 of the Permit.

Section B, item 2a: The facility was not documenting Chloroform samples dates and times for the 24 hour composites done weekly at Internal Outfalls 101, 102, 103.

Section B, item 2b: The facility was not documenting the individual performing Chloroform samples for the 24 hour composites done weekly at Internal Outfalls 101, 102, 103.

Section D, item 6: The sample tube at Outfall 001 was in need of replacement.

Section D, item 6: The facility has not been collecting the required minimum 12 effluent portions for a 24 hour composite at Internal Outfalls 101, 102, 103. See Attachment 6 for a copy of the facility's sample log for Internal Outfall 101.

Section G, Outfall 001: The facility had foam present below Outfall 001, but this foam was not in a persistent nature and dissipated below the Outfall.

Section G, SMS 002: The facility had foam present below SMS 002, but this foam was not in a persistent nature and dissipated below the SMS.

The facility was allowing distinct visible floating solids to be discharged from the SMS. The floating solids were in the form of duck weed and filamentous algae. See Attachments 4 and 5 for photos of the floating solids.



To: Patriciaa Willis/R6/USEPA/US@EPA

CC:

Subject: RE: Georgia Pacific inspection

Patricia,

Here is what I added to Attachment 3. I will send it like this, because the G-p file is so big. But this is word for word.

Section H: The facility removes sludge from the treatment plant via a clarifier for the pulp sewer and by the use of ash settling basins for the acid sewer. Both the sludge from the clarifier and ash basins are being used as fill material for closure of the old sludge pond. Also, ash from the settling basins is used for cover on the landfill (permitted by the ADEQ Solid Waste Division, Permit 292-S3N). As the solids are removed from the clarifier, they are dewatered by screw presses, then, the dewatered solids are trucked to the old sludge pond. As the solids are removed from the ash basins, they are dewatered by stock piling the solids beside the basins and allowed to dry. Then after a very large quantity of ash has accumulated, the facility transports the ash to the old sludge pond. (For more information, see the Permit fact sheet page 3, item 9.)

Other Conditions: Part III, item 9 of the Permit requires that Georgia Pacific (G-P) and the City of Crossett enter into and maintain an agreement for the discharge of the City's treated effluent into G-P's wastewater treatment system. G-P receives on average 1 MGD from the City' two oxidation lagoons prior to facility's Aerated Stabilization Basin (ASB). This agreement is in the final draft but has yet to be signed by the facility and the City. It is anticipated that the agreement be signed within a few weeks.

----Original Message----

From: Willis.Patriciaa@epamail.epa.gov [mailto:Willis.Patriciaa@epamail.epa.gov]

Sent: Tuesday, June 07, 2005 9:57 AM

To: Lamb, John

Subject: RE: Georgia Pacific inspection

John, I did remember the agreement letter and price, but couldn't remember exactly what the permit language read. Thanks again. (Embedded image moved to file: pic02600.gif)

Location: Georgia Pacific Crossett Paper Operations

Photographer: Patricia Willis Witness: John Lamb

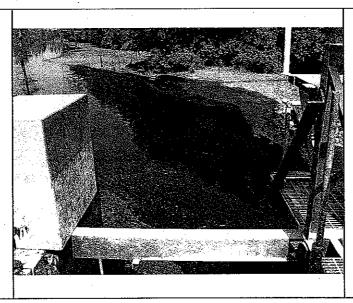
Photo# 1 Of 4 Date: 25 May 05

Description: Standing beside SMS 002, showing duck weed, and other floating solids floating in to SMS weir box



Photograp	her:	Patricia Willis		Witness:	Witness: John Lamb				
Photo #	2	Of	4		Date:	2	5 May 05		
		T							

Description: Standing on SMS weir box. Showing duck weed and other solids floating into the weir box



Location:	Georgia Pacific Crossett Paper Operations							
Photographer	Patricia Willis Witness: John Lamb		John Lamb					
Photo #	3	Of	4		Date:	25 May 05		
Description:		Lookin	g into SM	IS 002 weir box, showing	algae and du	ck weed being d	ischarged.	
Photographer	:	Patricia	a Willis	*	Witness:	John Lamb		
Photo #	4	Of	4	***	Date:	25 May 05		
Description:		Coffee water i	Creek en n the righ	tering the Ouachita River. t of the picture	Showing ef	fluent in the left	of the pictur	e and the River
					W.	de Verent Land		

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	Inspection Work Days		Facility Evaluation R	-	BI I	QA	 l	 	 I	Reserved
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			· · · · · · · · · · · · · · · · · · ·	Section 1	B: Fac	ility Data				
	me and Location of Facility Inspec			charging to POTW	, also		Time /Da	ite		Permit Effective Date
Geo	ude POTW name and NPDES per orgia Pacific Corporation-Crossett					10:0	5 Fime/Date			30 October 1991
Cros	ssett, AR					14:4				Permit Expiration Date 31 October 1991
	ne(s) of On-Site Representative(s) n Gathright/Senior Environmental			iber(s)					Otl	ner Facility Data
						<u> </u>			┧ .	
	ne, Address of Responsible Offici rles E. Hodges, Senior Vice Presi		hone and Fax Numb	er			0			
G-P	Crossett Box 3333					Yes		acted No X		
	ssett, AR 71635					103	السسا			
				ction C: Areas Ev ry, M = Marginal,				Evaluated)		
s	Permit	s	Flow Measureme		s	Operations			s	Sampling
s	Records/Reports	s	Self-Monitoring		s	Sludge Ha			N	Pollution Prevention
;	Facility Site Review	N	Compliance Scho	<u> </u>	N	Pretreatn	Ŭ	- .	N	Multimedia
,	Effluent/Receiving Waters	N	Laboratory		N	Storm Wa				Other:
		Se	ection D: Summary	of Findings/Com	ments	(Attach add	litional sl	neets if necessar	y)	
Sec	tion A: The facility's permit is	expired.	The facility is wai	ting to receive a 1	new pe	ermit.		-		
All	the records appeared in order.			•		•				
4222	append in state.									
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Nan Iohn	ne(s) and Signature(s) of Inspec n Wesley Lamb	tor(s)		Agency/Office/ ADEQ/El Dora			70-862-35	i09		Date 26 May 2004
			·			·······························				
Sign	nature of Reviewer			Agency/Office	/Phon	e and Fax N	umbers			Date

	PERMIT NO. AR0001210
SECTION A - PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: see page 1	JRTHER EXPLANATION ATTACHED VES)
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	■Y □N □NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	□Y □N ■NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	TY ON ONA
4. ALL DISCHARGES ARE PERMITTED	■Y □ N □ NA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.	RTHER EXPLANATION ATTACHED <u>NO</u>)
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	■Y □N □NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	■S □M □U □NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	■ Y□N □NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	■Y □N □N
c) ANALYTICAL METHODS AND TECHNIQUES.	MYC N CINA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	■Y □N □NA
e) DATES AND TIMES OF ANALYSES.	■Y □ N □ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	■Y □N □NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	■S□M □U □NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	MISOMOU ONE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	■Y □N □NA
SECTION C - OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. S M U NA (FURTI-	HER EXPLANATION ATTACHED NO
1. TREATMENT UNITS PROPERLY OPERATED.	MIS OM OU ONA
2. TREATMENT UNITS PROPERLY MAINTAINED	S D M D U D NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	■S □M □U □NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	MIS IM IU INA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	■S□M□U □NA
5. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	■S□M □U □NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	■S□M □U □NE
3. OPERATION AND MAINTENANCE MANUAL AVAILABLE. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	■Y□N □NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	■Y□N□NE